

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - NSPS SOURCE
REVISION

PERMITTEE

Seymour of Sycamore, Inc.
Attn: Nancy Seymour Heatley
917 Crosby Avenue
Sycamore, Illinois 60178

Application No.: 72100653

I.D. No.: 037055AAG

Applicant's Designation:

Date Received: November 14, 2005

Subject: Aerosol Paint Mixing and Filling

Date Issued: February 10, 2006

Expiration Date: December 27, 2007

Location: 917 Crosby Avenue, Sycamore

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of

16 Mixing Stations,
4 Propellant Filling Machines,
4 Aerosol Filling Machines
1 Bulk Paint Filling Line,
3 Sand Mills,
8 High Speed Mixers Controlled by Two Dust Collectors,
43 Storage Tanks (4 - 500 Gallon, 17 - 560 Gallon, 3 - 1,500 Gallon, 4 -
3,000 Gallon, 2 - 5,500 Gallon, 5,000-Gallon, 2 - 6,075-Gallon, 2 -
8,000-Gallon, 5 - 8,028-Gallon, 11,000-Gallon, 12,000-Gallon, and
29,853-Gallon),
Groundwater Treatment Operation
Soil Vapor Extraction System

pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., total combined hazardous air pollutants (HAPs) to less than 25 tons/year and any single hazardous air pollutant to less than 10 tons/year). As a result the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits issued for this location.

2. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish in rule which would require the Permittee to obtain a CAAPP permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.
- 3a. The 11,000-gallon storage tank is subject to New Source Performance Standards (NSPS), 40 CFR 60 Subpart Kb. The Illinois EPA is administering these standards in Illinois on behalf of the United States EPA under a delegation agreement.
- b. At all times, the Permittee shall, to the extent practicable, maintain and operate these tanks, in a manner consistent with good air pollution control practice for minimizing emissions, pursuant to the New Source Performance Standard.
- c. The Permittee shall fulfill the monitoring of operations requirements of the New Source Performance Standards, 40 CFR 60.116b(a) and (b) for the 11,000-gallon storage tank. That is, records showing the dimensions of the storage vessel and an analysis showing the capacity of the storage vessel, shall be maintained and readily accessible for the life of the source.
4. In the event that the operation of this emission unit results in an odor nuisance, the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.
5. Emissions and operation of propellant and aerosol paint mixing and filling operation shall not exceed the following limits:

<u>Process</u>	<u>Throughput</u>		<u>Pollutant</u>	<u>Emission</u>	<u>Emissions</u>	
	<u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>		<u>Factor</u>	<u>(Lb/Mo)</u>	<u>(Ton/Yr)</u>
Paint Formulation,	683,709	4,102,250	VOM	0.00619	4,232	12.70
Production, Material			Combined HAP	0.00543	3,712	11.14
Storage and Filling			Single HAP(Toluene)	0.00311	2,125	6.38
			PM	0.00391	2,051	8.02

These limits are based on compliance emission rate of 35 Ill. Adm. Code 212.321, emission factors derived from USEPA documents, maximum production rates, and information provided in the application. Compliance with annual limits shall be determined from a running total of 12 months of data.

- 6a. Emissions and operation of groundwater treatment operation shall not exceed the following limits:

<u>Process</u>	<u>Maximum Flowrate (gpm)</u>	<u>Maximum VOM Concentration (mg/L)</u>	<u>Emissions</u>	
			<u>(Lb/Hr)</u>	<u>(Tons/Yr)</u>
Wastewater Treatment	2.5	270	0.337	1.48
		Maximum Single HAP (Toluene) Concentration <u>(mg/L)</u>	<u>Emissions</u> <u>(Lb/Hr)</u>	<u>(Tons/Yr)</u>
			0.27	1.182
		Maximum Combined HAPs Concentration <u>(mg/L)</u>	<u>Emissions</u> <u>(Lb/Hr)</u>	<u>(Tons/Yr)</u>
			0.337	1.48

These limits are based on, maximum concentration levels, maximum flow rates, 8,760 hours of operation and complete volatilization of the VOM content. Compliance with annual limits shall be determined from a running total of 12 months of data.

- b. Emissions and operation of soil vapor extraction system shall not exceed the following limits:

<u>Process</u>	<u>Maximum Flowrate (scfm)</u>	<u>Maximum VOM Concentration (mg/kg soil)</u>	<u>Emissions</u>	
			<u>(Lb/Hr)</u>	<u>(Tons/Yr)</u>
Wastewater Treatment	40	13,610	3.426	2.50
		Maximum Single HAP (Toluene) Concentration <u>(mg/kg soil)</u>	<u>Emissions</u> <u>(Lb/Hr)</u>	<u>(Tons/Yr)</u>
		11,600	2.92	2.13
		Maximum Combined HAPs Concentration <u>(mg/kg soil)</u>	<u>Emissions</u> <u>(Lb/Hr)</u>	<u>(Tons/Yr)</u>
		13,610	3.426	2.50

These limits are based on, maximum concentration levels, maximum flow rates, 1,460 hours of operation and complete volatilization of the VOM content. Compliance with annual limits shall be determined from a running total of 12 months of data.

6. The issuance of this permit does not relieve the Permittee of the responsibility of complying with the provisions of the State of Illinois Rules and Regulations, Title 35: Subtitle C, Water Pollution Control, Chapter 1. The Permittee may need to obtain a permit from the Division of Water Pollution Control for operation of the wastewater system and discharge tributary to local water treatment facility.
7. No person shall cause or allow any visible emissions of fugitive particulate matter from any process, including any material handling or storage activity beyond the property line of the emission source, pursuant to 35 Ill. Adm. Code 212.301.
8. The Permittee shall, in accordance with the manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance on the pollution control equipment covered under this permit such that the pollution control equipment be kept in proper working condition and not cause a violation of the Environmental Protection Act or regulations promulgated therein.
9. The Permittee shall maintain records of the vendor recommendations at the facility and be available for inspection and copying by the Illinois EPA.
10. In the event that the operation of this emission unit results in an odor nuisance, the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.
11. The Permittee shall maintain the following records:
 - a. Total VOM and HAP emission factor determinations for each paint product (lbs/gallon);
 - b. Amount of each paint product produced (gallons/month and gallons/year);
 - c. Groundwater VOM and HAP concentration sample (mg/L); and
 - d. Total VOM and HAP emissions, and supporting calculations (lbs/month and tons/year).
12. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of

being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.

13. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.
14. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency
Division of Air Pollution Control
5415 North University
Peoria, Illinois 61614

Also it should be noted that this permit has been revised to incorporate the operation of Construction Permit No. 05110030.

Also it should be noted that this permit has been revised to incorporate existing equipment i.e. 3 aerosol filling machines, 5 high speed mixers, 4 mixing stations, and removal of 1 sand mill.

If you have any questions on this, please call George Kennedy at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:GMK:psj

cc: Illinois EPA, FOS Region 2
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the aerosol paint mixing and filling plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant producing 4,102,250 gallons of paint per year. The resulting maximum emissions are below the levels, e.g., 10 tons/year for a single hazardous air pollutant (HAP) and 25 tons/year for total combined hazardous air pollutants (HAPs) at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that control measures are more effective than required in this permit.

<u>Process</u>	E M I S S I O N S (Tons/Year)			
	<u>PM</u>	<u>VOM</u>	<u>Single</u> HAPs (Toluene)	<u>Combined</u>
Paint Formulation, Production, Material Storage and Filling	8.02	12.70	6.38	11.14
Wastewater Treatment		1.48	1.18	1.48
Soil Vapor Extraction		<u>2.50</u>	<u>2.13</u>	<u>2.50</u>
Total	<u>8.02</u>	<u>16.68</u>	<u>9.69</u>	<u>15.12</u>

GMK:psj